

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: IL-WON SHIN

GENERAL INFORMATION:

Name:	Green Tokai Company, Ltd
Address:	1725 Downing Drive, Maysville, KY 41056
Date application received:	April 19, 2005
SIC/Source description:	3089, Plastics Products, NEC
Source ID #:	21-161-00035
Source A.I. #:	39209
Activity #:	APE20050001
Permit number:	V-01-013 R1

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input checked="" type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
___ Administrative	<input checked="" type="checkbox"/> Title V
___ Minor	<input type="checkbox"/> Synthetic minor
<u>x</u> Significant	<input type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input checked="" type="checkbox"/> Not major modification per 401 KAR 51:017, 1(2)(b) or 51:052,1(14)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application

EMISSIONS SUMMARY:

The following table represents the facility PTE for the proposed extrusion line #6.

Pollutant	CAS #	PTE – Lbs/Hr	PTE - Tons/Year
VOC		5.19	22.72
Toluene	108-88-3	3.13	13.71
MEK (2-Butanone)	78-93-3	0.77	3.37
MIBK (4-Methyl-2-Pentanone)	108-10-1	0.23	1.01
Total HAP		4.13	18.09

The following table represents the facility total PTE including the proposed extrusion line #6.

Pollutant	CAS #	PTE – Lbs/Hr	PTE - Tons/Year
VOC		18.88	82.70
Toluene	108-88-3	8.55	37.45
MEK (2-Butanone)	78-93-3	4.52	19.78
Methanol	67-56-1	0.15	0.65
MIBK (4-Methyl-2-Pentanone)	108-10-1	1.27	5.54
Methyl Methacrylate	80-62-6	0.06	0.26
Total HAP		14.54	63.68

SOURCE DESCRIPTION:

Green Tokai Company (GTC) located at Maysville, Kentucky, manufactures plastic and rubber weather strip and sealing for the automobile industry. The manufacturing process includes plastic extrusion, flocking adhesive, cleaning, and finishing operations.

The source uses the facilities addressed in the Title V operating permit to manufacture a variety of automotive products from thermoplastic olefin (TPO) and polyvinyl chloride (PVC) plastic. These products are used for sealing and decorative products in automotive applications. A metallic core is coated with adhesive and then TPO or PVC is extruded on the core. The extruded plastic is then coated with a flocking adhesive and granulated nylon fibers (“floc”) are applied. Following the forming of the basic extrusion, the products are processed in secondary and finishing departments where mounting hardware may be applied.

GTC currently operates five extrusion lines in compliance with the permit V-01-013 and now wishes to add a sixth line. This new line will have a similar configuration to the existing processes and GTC will remain within the group limits specified in the issued permit. Emission Points (EPs) 01 – 06 are described in the current Title V permit (V-01-013), and the proposed extrusion line #6 (EP 07) will be incorporated into the Title V revised permit (V-01-013 R1). The source has accepted a volatile organic compounds (VOC) emission limit of 90 tons per year (TPY) to preclude 401 KAR 50:012 and 59:225. The actual VOC shall not exceed 90 TPY. This annual emission limitation shall not be exceeded during any consecutive twelve months period for the entire source. The addition of extrusion line #6 will not affect this emission cap, as all six lines will be able to operate under this limit. Please refer to the Group Requirements/Section D in the revised permit V-01-013 R1.

This source is subject to Title V operating permit requirements since the potential to emit (PTE) for single hazardous air pollutant (HAP) emission for the facility currently exceeds 10 TPY. In addition, total PTE for all combined hazardous air pollutants currently exceeds 25 TPY. Both the Plastic Parts Coating Maximum Achievable Control Technology (MACT) (40 CFR 63 Subpart PPPP) and the Miscellaneous Metal Parts Coating MACT (40 CFR 63 Subpart MMMM) will apply to the source. Because the existing metal and plastic parts coating operations were in place prior to the rule proposal dates in 2002, the new extrusion line #6 will be considered an existing source and must comply with these standards by their respective compliance dates in 2007.

Extrusion line #6 is not a new source for reasons discussed below.

40 CFR 63.4482(c)-(e) defines new, reconstructed and existing sources, respectively. Under (c), a source is new if it was installed after December 4, 2002 at a source where no plastic part coating or coating within the proposed subcategory had been performed. GTC's extrusion line #6 is therefore not "new" because they did perform plastic parts coating of both general plastic and TPO prior to December 2002. Under (d), the source is reconstructed if the fixed capital cost of reconstruction is greater than 50% of the cost for the entire source. The new line will not constitute more than 50% costs of the existing 5 lines. Therefore, the source is not reconstructed. Finally, (e) states that an affected source is existing if it is not new or reconstructed. As such, GTC will continue to be considered an existing source even after installation of extrusion line #6 and all 6 lines must comply with MACT requirements by April 19, 2007.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The source has accepted VOC emission 90 TPY to preclude 401 KAR 50:012 and 59:225. The actual VOC shall not exceed 90 TPY. This annual limitation shall not be exceeded during any consecutive twelve months period for the entire source. The addition of extrusion line #6 will not affect this cap, as all six lines will be able to operate under this limit. Please refer to the Group Requirements / Section D in the revised permit V-01-013 R1.

APPLICABLE REGULATION:

401 KAR 63:002, *National Emissions Standards for Hazardous Air Pollutants (Subpart MMMM and PPPP)*, applies to major sources of HAP.

40 CFR 63 Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, applies to major sources of NESHAP. The regulation 40 CFR 63 Subpart MMMM has to comply with a compliance date of January 2, 2007.

40 CFR 63 Subpart PPPP, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, applies to major sources of NESHAP. The regulation 40 CFR 63 Subpart PPPP has to comply with a compliance date of April 19, 2007.

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, applies to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

REGULATION NOT APPLICABLE:

401 KAR 59:225, *New miscellaneous metal part coating operations*. The facility is not a major source for VOC and is not located in an ozone nonattainment area.